

# EXHIBIT D

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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:  
*In re* :  
:  
THE FINANCIAL OVERSIGHT AND : PROMESA  
MANAGEMENT BOARD FOR PUERTO RICO, : Title III  
:  
as representative of : Case No. 17-BK-3283 (LTS)  
:  
THE COMMONWEALTH OF PUERTO RICO, : (Jointly Administered)  
*et al.*,<sup>1</sup> :  
Debtors. :  
-----X

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:  
*In re* :  
:  
THE FINANCIAL OVERSIGHT AND : PROMESA  
MANAGEMENT BOARD FOR PUERTO RICO, : Title III  
:  
as representative of : Case No. 17-BK-04780 (LTS)  
:  
PUERTO RICO ELECTRIC POWER : **Relates Only to PREPA**  
AUTHORITY (PREPA), :  
:  
Debtor. :  
-----X

**NOTICE OF DEPOSITION OF JOSE ROQUE TORRES BY CORTLAND CAPITAL  
MARKET SERVICES LLC, AS ADMINISTRATIVE AGENT, AND SOLUS**

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

**TO:** Jose Roque Torres, c/o O'Melveny & Myers LLP, Attention Elizabeth McKeen,  
610 Newport Center Drive, 17th Floor, Newport Beach, CA 92660.

**PLEASE TAKE NOTICE** that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, made applicable by Rule 9014 of the Federal Rules of Bankruptcy Procedure and section 310 of the Puerto Rico Oversight, Management, and Economic Stability Act, Cortland Capital Market Services LLC ("Cortland"), as administrative Agent for lenders under that certain Credit Agreement, dated as of May 4, 2012 among PREPA, Scotiabank de Puerto Rico, and the lenders party thereto, and SOLA LTD, Solus Opportunities Fund 5 LP, Ultra Master LTD, and Ultra BN LLC (collectively "Solus"), as lenders to PREPA under a certain Trade Finance Facility Agreement, dated as of July 20, 2012, among PREPA and Citibank, N.A., will take the deposition upon oral examination of Jose Roque Torres in connection with the *Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922 and 928, and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement and Tolling Certain Limitations Periods* [Dkt. No. 1235].

The deposition will take place on August 19, 2019, at 10:00 A.M., at the offices of Wachtell, Lipton, Rosen & Katz, 51 W. 52nd St., New York, NY 10019, or at such other time and place as may be agreed upon by counsel. The deposition will take place before a court reporter and will be recorded by stenographic means, may be videotaped, and shall continue from day to day until it has been completed.

Dated: August 4, 2019

/s/ Nayuan Zouairabani

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/s/ Emil A. Kleinhaus

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Fund 5 LP, Ultra Master LTD, and Ultra NB  
LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 4, 2019, a true and correct copy of the *Notice of Deposition of Jose Roque Torres by Cortland Capital Market Services LLC, as Administrative Agent, and Solus* was served on the following: agraitfe@agraitlawpr.com; epo@amgprlaw.com; loliver@amgprlaw.com; jramirez@amrclaw.com; notificaciones@bufete-emmanuelli.com; rolando@bufete-emmanuelli.com; jessica@bufete-emmanuelli.com; dperez@cabprlaw.com; hburgos@cabprlaw.com; reasellas@cabprlaw.com; aaneses@cstlawpr.com; cfernandez@cstlawpr.com; lllach@cstlawpr.com; jcasillas@cstlawpr.com; jnieves@cstlawpr.com; bill.natbony@cwt.com; casey.servais@cwt.com; ellen.halstead@cwt.com; howard.hawkins@cwt.com; mark.ellenberg@cwt.com; thomas.curtin@cwt.com; eworenklein@debevoise.com; mcto@debevoise.com; scastillo@gaclaw.com; bwilliam@gklaw.com; cintrongarcialaw@gmail.com; dvelawoffices@gmail.com; lcda.wentorres@gmail.com; wssbankruptcy@gmail.com; nhamerman@kramerlevin.com; abyowitz@kramerlevin.com; acaton@kramerlevin.com; ghorowitz@kramerlevin.com; tmayer@kramerlevin.com; bill.pentelovitch@maslon.com; clark.whitmore@maslon.com; jason.reed@maslon.com; john.duffey@maslon.com; nzt@mcvpr.com; apavel@omm.com; emckeen@omm.com; jrapisardi@omm.com; nmitchell@omm.com; pfriedman@omm.com; ryang@omm.com; alexbongartz@paulhastings.com; andrewtenzer@paulhastings.com; jamesbliss@paulhastings.com; jamesworthington@paulhastings.com; lucdespins@paulhastings.com; michaelcomerford@paulhastings.com; nicholasbassett@paulhastings.com; pedrojimenez@paulhastings.com; zacharyzwillinger@paulhastings.com; bclark@proskauer.com; ebarak@proskauer.com; ecarino@proskauer.com; gmashberg@proskauer.com; jljonas@proskauer.com; lgeary@proskauer.com; lstafford@proskauer.com; lwolf@proskauer.com; mbienenstock@proskauer.com; mdale@proskauer.com; mmervis@proskauer.com; ppossinger@proskauer.com; etulla@riveratulla.com; icabrera@riveratulla.com; edward.linden@stblaw.com; jamie.fell@stblaw.com; sarah.phillips@stblaw.com; bfriedman@stblaw.com; nbaker@stblaw.com; squsba@stblaw.com; lft@tcm.law; mfb@tcm.law; nperez@tcm.law; jvankirk@tcmrslaw.com; brian.liegel@weil.com; debora.hoehne@weil.com; gregory.silbert@weil.com; jeremy.auster@weil.com; jeremy.cain@weil.com; jonathan.polkes@weil.com; lara.ting@weil.com; lauren.haiken@weil.com; marcia.goldstein@weil.com; moshe.fink@weil.com; national.puerto.rico.receiver.litigation.team@weil.com; reed.collins@weil.com; robert.berezin@weil.com; akherring@wlrk.com; arwolf@wlrk.com; eakleinhaus@wlrk.com; jccelentino@wlrk.com; jlynch@wlrk.com; rgmason@wlrk.com.

Dated: August 4, 2019

/s/ Angela K. Herring

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Amy R. Wolf (admitted *pro hac vice*)

John F. Lynch (admitted *pro hac vice*)

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